



Fox Rothschild LLP
ATTORNEYS AT LAW

101 Park Avenue, Suite 1700
New York, NY 10178
Tel 212.878.7900 Fax 212.692.0940
www.foxrothschild.com

Raquel A. Gutiérrez
Direct Dial: (646) 601-7637
Email: rgutierrez@foxrothschild.com

August 29, 2017

VIA ECF

Honorable Gregory H. Woods
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, New York 10007

Re: Rivera, et al. v. Relay Delivery, Inc. et al.
Civ. Action No. 17-CV-5012 (GHW)

Dear Judge Woods:

We represent the Defendants in the above-referenced matter. We write this letter jointly with Plaintiffs' counsel pursuant to Your Honor's individual rule of practice 4(C), to respectfully request that the Court Order the parties' Stipulated Confidentiality Agreement and Protective Order ("Protective Order").

The parties' proposed Protective Order is annexed hereto as Exhibit A. The proposed Protective Order does not deviate in any way from the Court's Model Protective Order.

We thank the Court for its time and consideration in this matter. Please contact the undersigned if the Court requires any additional information.

Respectfully submitted,

FOX ROTHSCHILD LLP

/s/

Raquel A. Gutiérrez

cc: Lina Franco, Esq. (by ECF)
Carolyn D. Richmond, Esq. (Fox Rothschild LLP – NYC)
Alexander Leonard, Esq. (Fox Rothschild LLP – NYC)

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